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November 12, 2021

VIA ECF

Re:

Honorable John G. Koeltl United States District Court Southern District of New York 500 Pearl St. New York, NY 10007-1312 Application granted. SO ORDERED.

New York, NY <u>/s/ John G. Koeltl</u> December 17, 2021 John G. Koeltl, U.S.D.J.

Ms. Dancy v. Westchester ALP Management LLC, et al

Case No. 21-CV-3866 (JGK)

Dear Judge Koeltl:

Defendants write, pursuant to Your Honor's Individual Rules, to request an extension of the time allotted for fact discovery. As of today's date, the parties are working together to complete written discovery by November 19, 2021. However, due to issues discussed herein, it has become apparent that additional time will be necessary to complete all fact discovery. Defendants propose an extension of three months. The parties have conferred, and Plaintiff consents to Defendants' request. This is Defendants' first request for an extension of discovery.

An extension is necessary because of the following complication that has arisen. Plaintiff's counsel served extensive discovery requests involving two different defendants. The undersigned was out of the country for the first portion of the response period and, due to the limited in-person workforce at Defendant's office, the collection of documents has been a time-consuming process that is taking longer than anticipated. Once Defendants can complete their document productions, they expect to conduct depositions in early 2022, allowing sufficient time to account for the holidays.

For the foregoing reasons, the parties jointly propose the following schedule:

• Completion of Fact Discovery: February 21, 2022

• Expert disclosures, if any, must be made by: March 7, 2022

• Completion of Expert Discovery: May 2, 2022

Honorable John G. Koeltl Novmeber 12, 2021 Page 2

• Dispositive Motions due: May 30, 2022

• Joint Pre-Trial Order due: June 20, 2022 or 3 weeks after decision of any dispositive motions

• Ready-Trial, 48 Hours Notice: July 11, 2022

Thank you for your attention to this matter.

Respectfully submitted,

LITTLER MENDELSON P.C.

By <u>/s/Elizabeth R. McKenna</u> Elizabeth R. McKenna

Attorneys for the Defendant